

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Chapter 11

Case No. 22-11068 (KBO)

FTX TRADING LTD., *et al.*,

(Jointly Administered)

MOTION TO EXTEND TIME TO COMPLETE KYC REQUIREMENTS

Morgan & Morgan, P.A. hereby requests an extension of time to enable their clients to fully resolve pending outstanding issues that have previously been brought to the attention of Debtor's counsel, but have not yet been resolved, in regard to timely submitted claims pursuant to the instant bankruptcy proceedings regarding FTX Trading LTD ("Debtor"), including but not limited to completion of KYC requirements, which is otherwise subject to a June 1, 2025 deadline, and states:

1. Under Fed. R. Bankr. P. 9013-1, the Bankruptcy Court may, upon motion, grant an extension or enlargement of time to allow for claimants to fully resolve any and all outstanding issues regarding their respective, timely submitted claims.

2. An extension of time is appropriate herein due to the fact that a substantial majority of Morgan & Morgan's clients have been unable to (and not for lack of effort) complete the KYC requirements, their distribution amount is still showing as disputed, and/or counsel for FTX has not yet resolved, and/or responded to, requests for further assistance, regarding same.

3. Starting as far back as October, 2024, counsel for Morgan & Morgan clients has been communicating regularly with Debtor's counsel regarding questions and concerns about their clients' claims, after making little to no progress with the FTX bankruptcy administrators (Kroll)

regarding same.

4. Throughout November 2024, Attorney Isaiah (Morgan & Morgan) regularly corresponded with Debtor's counsel in an effort to resolve our clients' issues. In January 2025 and February 2025, emails and phone calls took place between Attorney Isaiah and counsel for Debtor at which times multiple email attachments, including Excel spreadsheets identifying respective client issues, were sent to counsel for review/explanation.

5. To date, since our most recent email was sent to Debtors' counsel on April 2, 2025, regarding outstanding issues still pending, no response has been received as to any potential resolution (we were advised that things were slow-moving, due to the unprecedented number of claimants), or what could be done to facilitate a resolution to these issues.

6. Morgan & Morgan has spent numerous hours via phone and email corresponding with their clients to assist in finding a solution to the various problems they are encountering (log in issues, verifying their identity, their claim amount showing up as disputed, etc.).

7. In addition, Morgan & Morgan has also spent countless hours corresponding with FTX Support via support@ftx.com to assist in finding a solution to the various problems their clients are encountering.

8. While some Morgan & Morgan clients' issues were indeed resolved, mainly due to the efforts described above, such is not the case for a substantial majority of Morgan & Morgan clients, however, said result is not for lack of effort.

9. An extension of the June 1, 2025 deadline to August 31, 2025, to enable Morgan & Morgan to continue working with Debtor's counsel to resolve all pending, outstanding client issues, including completion of KYC requirements, is reasonable and appropriate under the circumstances, in order to facilitate a recovery of funds that said clients are entitled to.

10. Moreover, it would not be an undue burden to the bankruptcy estate to allow for said extension of time, as the total amount of claims at issue with respect to all Morgan & Morgan clients experiencing the issues described above, is less than a thousandth of one percent of the total amount of claims of all claimants in the instant proceedings.

WHEREFORE, Movant requests an extension of time, thereby extending the June 1, 2025 deadline re KYC compliance, etc., to August 31, 2025, to provide additional time for Morgan & Morgan to continue working with Debtor's counsel to resolve all outstanding, pending issues, and for such further relief as the Court deems appropriate.

Dated: May 16, 2025

/s/ Amir Isaiah

Attorney Amir A. Isaiah
Morgan & Morgan, P.A.
Business Trial Group
20 North Orange Avenue, Suite 1600
Orlando, Florida
Email: isaiah@forthepeople.com
Phone: (305) 929-1920

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 16, 2025, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will serve an electronic copy on all counsel of record.

/s/ Amir Isaiah

Attorney Amir Isaiah
Florida Bar No. 32101
Morgan & Morgan, P.A.
Business Trial Group
20 North Orange Avenue
Suite 1600
Orlando, FL 32801
Email: isaiah@forthepeople.com
Phone: (305) 929-1920